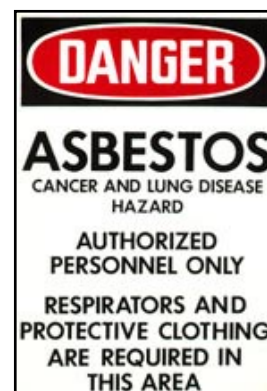


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1.0 PURPOSE & SCOPE

The purpose of this procedure is to document the role of the BNL organizations that deliver services in the BNL Asbestos program. This SOP documents program components not addressed in the SBMS Subject Area *Asbestos*, and is a companion to that subject area and other organizational level SOPs and documents.

As a minimum, the BNL program will comply with the BNL SBMS *Asbestos* Subject Area, DOE, OSHA, and EPA regulations.

2.0 RESPONSIBILITIES

- 2.1 Members of the SHSD Industrial Hygiene Group, the Radiological Control Division , Occupational Medicine Clinic, Plant Engineering Division, and Office of Training and Qualification have certain roles in this program.
- 2.2 It is the responsibility of persons with a role in the delivery of services to comply with their organizational procedures and the SBMS Subject Area. This SOP does not confer any added responsibilities on a BNL organization, but does describe the current

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service delivery model for BNL and delineates the role each organization traditionally plays in the BNL Asbestos program.

2.3 Plant Engineering role:

- Evaluate asbestos presence & hazards in building maintenance, construction, and demolition jobs.
- Maintain EPA certification expertise to manage asbestos in place at BNL.
- Qualify the staff for operation and maintenance work.
- Qualify the staff for construction and demolition work.
- Oversee sub-contractors for construction and demolition work.
- Notify EPA of planned and unplanned operations involving the disturbance of asbestos or the demolition of a structure.
- Process asbestos waste for appropriate off-site disposal.

2.4 Safety and Health Services Division (SHSD) - Industrial Hygiene Group (IH) role:

- Serve as Subject Matter Expert (SME) for the SBMS *Asbestos* subject area.
- Conduct a periodic audit to ensure compliance with the provisions of the program.
- Assist RCD-FS and Plant Engineering in evaluating tasks and specifying the appropriate asbestos sampling and control techniques.

2.5 Radiological Control Division (RCD) - Facility Support (FS) role:

- Evaluate tasks, specify asbestos sampling, recommend personal protective equipment, and review and sign work permits involving asbestos program activities.
- Conduct the appropriate asbestos sampling on asbestos workers.

2.6 Occupational Medicine Clinic (OMC) role:

- Provide medical fitness evaluations for personnel exposed or potentially exposed to asbestos.
- Evaluate medical problems related to asbestos use.

2.7 Training & Qualification Office role:

- Provide Asbestos Awareness classes as requested.
- Provide a recordkeeping system (BTMS) for recording awareness and EPA level qualifications.

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3.0 DEFINITIONS none

4.0 PREREQUISITES

- 4.1 Organizations identified in this document detail their responsibilities for implementing their role in organization-level documentation such as SOP's or by an equivalent mechanism such as certification of workers by third party sources.
- 4.2 Organization SOP's shall be sufficiently detailed as to clearly define personnel roles, responsibilities, and accountabilities for implementation of the Asbestos Program.

5.0 PRECAUTIONS

- 5.1 This SOP supplements the contents of other established programs. These other programs must be followed for safety and regulatory compliance, including:
 - BNL SBMS Subject Area *Asbestos*,
 - Line organization standard operating procedures, and
 - Job and task specific instructions, such as work permits or experimental reviews.

6.0 PROCEDURE

BNL asbestos program that contains:

- 6.1 Corporate Written Program: The SBMS *Asbestos* subject area specifies the requirements and duties for each division and department working with asbestos.
- 6.2 Internal Control Documents: This SOP lists the activities each service provider plays in the total Asbestos Program at BNL. Organizational level SOPs or other type documents specify the activities performed by a service provider group on their portion of the total BNL program. Organizations with internal control documents:
 - 6.2.1 Safety and Health Services maintains procedures for sampling and personal protective equipment selection at <http://www.bnl.gov/esh/shsd/ih/SOPs.htm>.
 - 6.2.2 Plant Engineering maintains procedures for their role in the protection of workers and the public from the hazards of asbestos in building materials at

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BNL. The procedures defining asbestos handling & removal activities are found at:

http://epweb.pe.bnl.gov/div/ep_procedures/policies.asp?cNumber=&cTitle=asbestos&dept_id=0&Search=Search&exe=1&dept=management

- 6.3 Asbestos Program Administrator: The SHSD IH Group Leader designates a person to maintain the Subject Area *Asbestos* and have responsibility for the contents of the written program. The BNL asbestos program is evaluated on a periodic basis by the Asbestos Program Administrator. Deficiencies are identified and corrective actions initiated as part of the evaluation process.
- 6.4 Asbestos Competent Person: Plant Engineering designates a person to serve as that organization's lead on projects containing asbestos containing material (ACM). That person ensures project design documents are compliant with regulations, notifies DOE and EPA of renovation and demolition work, oversees the work of subcontractors contacting ACM, and processes ACM generated at BNL for legal disposal.
- 6.5 Medical Approval: The Occupational Medical Clinic (OMC) provides medical approval for personnel whose job descriptions include exposure to or the potential for exposure to asbestos. Line organizations identify workers with potential for asbestos exposure and indicate the need for medical surveillance via the OMC Job Hazard Analysis form. The SBMS Asbestos Subject Area contains the BNL policy and procedures on medical surveillance.
- 6.6 Training: TQPO is responsible to develop or support the delivery of training to personnel working with asbestos. They may contact outside providers to supply the service or serve as the main service provider. Line organizations may also use outside service providers for EPA certification classes. The SBMS Asbestos Subject Area contains the BNL policy and procedure on training.
- 6.6.1 Workers for OSHA Class I, II, and III attend training supplied by off-site EPA certified providers arranged by Plant Engineering. Plant Engineering delivers Operation & Maintenance (Class IV) training to appropriate worker.
- 6.6.2 Employees seeking EPA and OSHA specialized certifications, such as Asbestos Project Designer, attend training supplied by off-site EPA certified providers arranged by the line organization.
- 6.6.3 TQPO maintains a system for keeping records of this training via the BTMS system.

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- 6.7 Sampling for Asbestos Hazards: Plant Engineering, SHSD IH, or Facility Support (FS) personnel conduct personal and area monitoring as necessary to determine the asbestos hazard's concentration and to ensure that the appropriate level of asbestos exposure protection is provided.
- 6.8 Management of projects: All site in-place asbestos is managed via Plant Engineering. All projects with the potential to disturb asbestos are directed through Plant Engineering. Plant Engineering has the responsibility to conduct all OSHA Class I, II, and III work using either BNL or sub-contractor EPA certified workers. Plant Engineering performs all Operation & Maintenance (Class IV) level work using appropriately trained worker.

7.0 TRAINING & QUALIFICATION

- 7.1 Only personnel who have demonstrated competency, to the satisfaction of their management, are qualified to perform a role in this program. There is no qualification for this specific SOP, but the underlying activities conducted in support of this program may have training or qualification requirements.
- 7.2 Each supporting organization shall establish competency and qualification criteria for the tasks to be assigned to their personnel. Qualification criteria are established commensurate with the task to be performed. Records of qualification of service providers are documented and maintained by the service provider's organization management or BTMS, as appropriate.

8.0 REFERENCES

- 8.1 Occupational Safety and Health Administration (OSHA); *Asbestos*, 29CFR1910.1001 and 29CFR1926.1101
- 8.2 Environmental protection Agency 40CFR763 TSCA *Asbestos*; 40CFR61 NESHAP National Emission Standard for Asbestos
- 8.3 New York State Code Rule 12NYCR56 *Asbestos*

9.0 ATTACHMENTS none

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10.0 DOCUMENTATION

Document Development and Revision Control Tracking		
Prepared By: <i>(signature/date on file)</i> D. Robbins 11/26/04 Certified Industrial Hygienist	Reviewed By / Date: <i>(signature/date on file)</i> J. Peters 07/05/05 Certified Industrial Hygienist	Approved By / Date: <i>(signature/date on file)</i> R. Selvey 07/06/05 Industrial Hygienist Group Leader
ESH Coordinator/ Date: <div style="text-align: center;">none</div>	Work Coordinator/ Date: <div style="text-align: center;">none</div>	SHSD Manager / Date <div style="text-align: center;">none</div>
QA Representative / Date: <div style="text-align: center;">none</div>	Training Coordinator / Date: <div style="text-align: center;">none</div>	Filing Code: IH52.05
Facility Support Rep. / Date: <div style="text-align: center;">none</div>	Environ. Compliance Rep. / Date: <div style="text-align: center;">none</div>	Effective Date: 07/07/05
ISM Review - Hazard Categorization <input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low/Skill of the craft	Validation: <input type="checkbox"/> Formal Walkthrough <input checked="" type="checkbox"/> Desk Top Review <input type="checkbox"/> SME Review Name / Date:	IMPLEMENTATION: Training Completed: n/a Procedure posted on Web: Y Hard Copy" files updated: Y

Revision Log		
Purpose: <input type="checkbox"/> Temporary Change <input type="checkbox"/> Change in Scope <input type="checkbox"/> Periodic review <input type="checkbox"/> Clarify/enhance procedural controls		
Changed resulting from: <input type="checkbox"/> Environmental impacts <input type="checkbox"/> Federal, State and/or Local requirements <input type="checkbox"/> Corrective/preventive actions to non-conformances <input type="checkbox"/> none of the above		
<i>(signature/date on file)</i> SME Reviewer/Date:	Reviewer/Date:	Reviewer/Date:
Section/page and Description of change:		